REMARKS

Claims 1-23 are pending in the application. Claims 1- 6, 10-12, and 16 have been amended. Further, claims 22-23 are newly added to the application. No new matter has been introduced by the amendment.

Rejection Under 35 U.S.C. § 102(b)

Claims 1-21 have been rejected over Ng et al. This rejection is overcome in view of the amendment of claims 1-6, 10-12, and 16, together with the following remarks.

Claim 1, as amended, recites a semiconductor component in which a first substructure extends in a first common plane and includes at least two electrically conductive regions. The at least two electrically conductive regions are electrically isolated from the crossing metal leads and are arranged in openings in the first cohesive latticed metal region of the first substructure. The at least two electrically conductive regions are electrically connected to second conducting lines, and the at least two electrically regions are electrically isolated from one another by the latticed metal region.

The Applicant asserts that the semiconductor component recited by claim 1 is not suggested or disclosed by Ng et al. The Applicant's previous remarks regarding Ng et al. are incorporated herein. None of the capacitor structures disclosed by Ng et al. have at least two electrically conductive regions within a cohesive latticed metal region extending in a first common plane, and electrically isolated from one another by the latticed metal region. Accordingly, claim 1, as amended, distinguishes over Ng et al. and is in condition for allowance.

Claim 2 has been amended to improve its form by removing reference to extraneous subject matter. Claim 2 is allowable at least in view of its dependence on claim 1.

Claims 3-6 have been amended to maintain consistency with the amendment of claim 1 from which they indirectly depend. Claims 3-6 are allowable at least in view of their indirect dependence from claim 1.

Claims 7-9 depend directly or indirectly from claim 1 and are allowable in view of their dependence from claim 1.

Claim 10 has been amended to maintain consistency with the amendment of claim 1 from which it depends.

Claim 11, as amended, recites a semiconductor component in which electrically conductive regions are arranged in each of at least two openings in each of the first and second metal lattices. The structure recited by claim 11 substantially differs from Ng et al., at least because Ng et al. fail to suggest or disclose at least two openings in a latticed metal region. The Applicant disagrees with the Examiner's characterization of Ng et al. as disclosing at least two openings. (Office Action, pg. 5). In the device shown by Ng et al. in Fig. 2 below, each level of the device defines only a single opening.

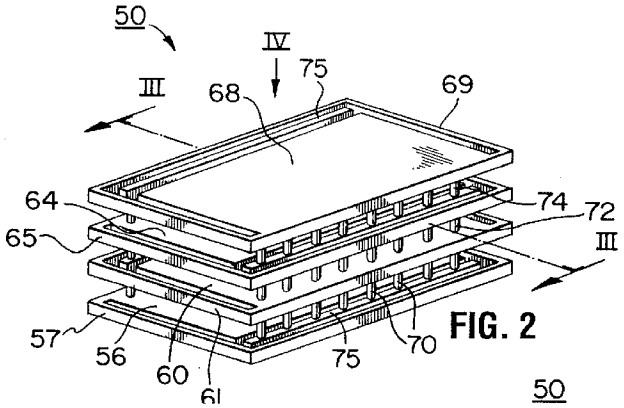

FIG. 2

The single opening is defined by the main portion and a surrounding portion of each electrode. (See Col. 7, lines 4-9). Accordingly, each level of the Ng et al. device has a single opening and a single separate part (75). Accordingly, claim 11 distinguishes over Ng et al. and is in condition for allowance.

Claim 12 has been amended to improve its form by specifying that the electrically conductive regions reside in the first and second metal lattices. This claim is allowable at least in view of its dependence from claim 11.

Claims 13-15 are allowable at least in view of their dependence from claim 11.

Claim 16, as amended, recites a semiconductor component having first and second metal lattices. The first metal lattice includes intersecting metal leads in a first common plane, and the second metal lattice includes intersecting metal leads in a

second common plane. The intersecting metal leads in each of the first and second metal lattices define a checkerboard pattern. The Applicant asserts that the semiconductor component of claim 16 is not suggested or disclosed by Ng et al. This is at least because Ng et al. fail to suggest or disclose a semiconductor component that includes metal lattices. The structures disclosed by Ng et al. do not define any type of lattice arrangement, as defined by the Applicant's claims.

Claim 17-21 are allowable at least in view of their direct or indirect dependence from claim 16.

New Claims

Claims 22-23 are newly added to the application in order that the Applicants can more fully claim the subject matter of their invention.

Claim 22 recites a semiconductor capacitance component that includes a first metal lattice extending in a plane. The first metal lattice includes crossing metal leads that define crossing points and a plurality of openings therein. Each of the plurality of openings is circumferentially enclosed by the crossing metal leads. First connecting lines are electrically connected to the first metal lattice, and second connecting lines are electrically connected to the first electrically conductive regions located in the plurality of openings.

The Applicant asserts that the semiconductor component recited in claim 22 is not suggested or disclosed by Ng et al. This is at least because Ng et al. fail to suggest or disclose a plurality of openings in a metal lattice extending in a plane, and in which the openings are circumferentially enclosed by crossing metal leads.

Claim 23 depends from claim 22 and recites a second metal lattice extending in a second plane and having substantially the same features as the first metal lattice. Second electrically conductive regions are located in the plurality of openings of the second metal lattice and are substantially vertically aligned with the crossing points of the first metal lattice. The first connecting lines electrically connect the crossing points of the first metal lattice to the second electrically conductive regions. Further, the

second connecting lines electrically connect the first electrically conductive regions to the crossing points of the second metal lattice.

The Applicant asserts that in addition to failing to suggest or disclose the Applicant's metal lattices, Ng et al. also fail to suggest or disclose crossing points as recited in the Applicant's claims. The structure disclosed by Ng et al. in Fig. 2 does not include any features even remotely related to the Applicant's claimed crossing points. The claims precisely define crossing points with respect to independent metal leads. Such independent metal leads are completely absent in the structures disclosed by Ng et al.

In response to the Examiner's remarks at page 2 of the instant Office Action, the Applicant respectfully asserts that the electrical isolation referred to in the Applicant's claims is clearly related to electrical isolation within the individual planes of the Applicants' device. The Examiner analogizes the separate part (75) of Ng et al., shown above, with the Applicant's claimed electrically conductive regions. Since there is only one separate part in each of the layers of the Ng et al. device, this device does not suggest or disclose the Applicant's arrangement in which electrically conductive regions are isolated by metal leads in the same plane as the electrically conductive region.

The Applicant has made a novel and non-obvious contribution to the art of semiconductor component design. The claims at issue distinguish over the cited references and are in condition for allowance. Accordingly, such allowance is now earnestly requested.

Respectfully submitted,

Dated: December 3, 2008

/Jasper W. Dockrey/
Jasper W. Dockrey, Reg. No. 33,868
Attorney for Applicant

BRINKS HOFER GILSON & LIONE
P.O. BOX 10395
CHICAGO, ILLINOIS 60610
(312) 321-4200